

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-40 (JRT/LIB)**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**(1) HARSHKUMAR RAMANLAL PATEL
a/k/a “Dirty Harry,”
a/k/a Harry Patel,
a/k/a Param Singh,
a/k/a Haresh Rameshlal Patel,
a/k/a Harshkumar Singh Patel, and
(2) STEVE ANTHONY SHAND,**

Defendants.

**GOVERNMENT’S
NOTICE OF
DISCLOSURE OF
EXPERT WITNESSES**

The United States of America by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, Assistant United States Attorney Michael P. McBride and Trial Attorney Ryan Lipes, hereby files this Notice of Disclosure of Expert Witnesses.

In compliance with Federal Rule of Criminal Procedure 16(a)(1)(G), the Government provided notice to defense counsel for both defendants of its intent to call Special Agent Nicole Lopez, Daryl Ritchison, Dr. Angela Miller, and Dr. Charles Littman as expert witnesses on October 21, 2024 (*see* Attachment 1)

and its intent to call Craig Hellmann as an expert witness on October 29, 2024
(see Attachment 2).

The letters in Attachment 1 and 2 were sent to defense counsel for both parties by email on the date of the letter. The exhibits accompanying the letter (including expert reports, underlying data, and CVs) were sent to counsel for both defendants by email on the same date as the letters.

Dated: October 29, 2024

Respectfully submitted,

ANDREW M. LUGER
United States Attorney

By: /s/ Ryan Lipes
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